

OCT 11 2001

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10 MS. SIMKINS: My name is Connie Simkins. I  
11 live in Panaca and I have been a 57-year resident of  
12 this valley.

13 My family has been engaged in the trucking  
14 industry for the past 50 years. So most of my comments  
15 are centered around transportation and have to do with  
16 my -- the things that I learned while I served on the  
17 Community Advisory Board for six and a half years for  
18 low level waste at the Nevada Test Site.

19 We were successful -- and when I say we in  
20 this instance, I mean the Community Advisory Board. We  
21 were successful in getting permission to make comments  
22 on the Yucca Mountain EIS and I worked on the comments  
23 that our board put together and I'll be using some of  
24 those points in my comments tonight.

25 Transportation issues. It's recommended that

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1 DEIS specify alternatives regarding modes of transport,  
2 routing and consider the effects of weather-related  
3 route modifications, construction delays and so forth.

4 The DEIS must analyze and present in more  
5 detail the complexities and management of large scale

6 spent nuclear fuel transport to and into Nevada.

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7 Cumulative impacts, and this is one that I  
8 feel very strongly about. The -- I feel the DEIS fails  
9 to evaluate the cumulative impacts of all shipments to  
10 Yucca Mountain, not just the high level radioactive  
11 waste that would be stored there, but to me that's like  
12 saying, okay, we're going to take -- we're going to talk  
13 about transportation and we're going to look at this  
14 road out here and we're only going to count the red  
15 cars. If there's ten red cars go down the road, yeah,  
16 there's so much problems or there's so much benefits.

17 But in order for this document to really have  
18 credibility and to be really valuable I feel it must  
19 contain the cumulative numbers of all trucks going to  
20 the Nevada Test Site, not just the high level waste  
21 carrying trucks, but the low level trucks and the new  
22 material trucks and the garbage trucks and every kind of  
23 truck that is on the road.

24 Some of the most important parts of this are  
25 the routes, and in order to put this information

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1 together correctly I believe you must have a recognition  
2 of every truck that is on the road, whichever road it is

3 that -- route it is that is chosen.

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4 You have to have a picture of how many trucks  
5 are there and how many of them are heavy haul trucks and  
6 how many of them are unloaded trucks and how many of  
7 them are loaded trucks because this -- these are the  
8 kind of impacts that show up in communities that these  
9 trucks travel through.

10 If there's 10 trucks today and because of the  
11 Yucca Mountain project there's 20 trucks tomorrow, that  
12 doesn't mean there's just 10 trucks because they're  
13 Yucca Mountain trucks. It means there's 20 trucks,  
14 which is twice as many trucks as there was without the  
15 project.

16 So I feel the DEIS must do further analysis  
17 of the cumulative impacts of all potential and ongoing  
18 federal waste disposal and generator programs.

19 The document does not address the risks, nor  
20 the procedures necessary to transfer waste from the DOE  
21 or the generator to the carrier. The DEIS must provide  
22 further analysis of nuclear waste transfer procedures,  
23 risks and modes among the generators, carrier and  
24 receiver.

25 And one of the ways I feel both the impacts

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1 and the procedures could be improved is for the  
2 Department of Energy to take the stand and to do  
3 whatever it needs to do to make sure that it becomes  
4 part of their regulations, a mandatory part of their  
5 regulations that the carriers, when they're given a  
6 contract to carry this waste to the Nevada Test Site,  
7 that in that contract it specifies the route.

8 I understand that is not what happens today,  
9 but in order for this to be safe and to do it as safe as  
10 possible and as wise on the impacts of the communities  
11 that these trucks come through, I feel you must specify  
12 the route in the contract for the carrier.

13 A credible analysis of mode selection  
14 involves optimizing the cost and the safety. I feel  
15 quite strongly about this, too. I feel that -- maybe  
16 this is a good time for me to say I'm not opposed to  
17 Yucca Mountain. I'm not opposed to nuclear waste. I'm  
18 not opposed to storing it at Yucca Mountain. But I  
19 think you could sum this up in about one sentence and  
20 say base the plans of Yucca Mountain on science, period,  
21 not politics, not money, not based on who owns the rail  
22 spur that they want to select as one of the modes of

23 transportation, but pure science.

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24 The DEIS must provide a more complete cost

25 risk benefit analysis between the modes of truck and

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1 rail into Yucca Mountain. A more complete analysis of

2 the impacts would include the potential to further

3 economic development to rural Nevada based on new

4 transportation routes and modes for either and/or both

5 modes to Yucca Mountain. That means train and/or truck.

6 This is something that we had worked on for a

7 long time is to get included in the DEIS the ability of

8 private enterprise to use the railroad or to use the

9 heavy haul road at times it is not being used by the

10 trucks that carry the high level nuclear waste.

11 It's going to be a horribly expensive project

12 no matter which route they use or which mode they use or

13 how they build it or where they build it, and that's all

14 taxpayers dollars, and we'd like to see the potential

15 for businesses to develop in these valleys in Nevada

16 before you get to the Nevada Test Site, specifically on

17 the -- one of the routes that is mentioned is from

18 Caliente over towards Tonopah, and down that way and

19 into Yucca Mountain there are a couple of valleys that

20 are presently engaged in raising alfalfa, hay and  
21 different grains.

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22 If these private farmers could have access to  
23 putting their crops on the railroad or the improved  
24 pavement, it would -- it would help their business, and  
25 it could be scheduled at a time because these trucks

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1 that are carrying the nuclear waste are going to have  
2 transponders on them. They're going to know within 20  
3 yards where that truck is at all times. So it would not  
4 raise an additional safety concern.

5 It would make better use of the  
6 transportation modes that are chosen. If the -- if a  
7 railroad is built to Yucca Mountain and the train takes  
8 the full cars out there or the full casts or whatever it  
9 is that's decided to be used, then they're going to have  
10 to come back empty, and either those cars or fresh cars  
11 that are appropriate for carrying alfalfa cubes, it  
12 would really help the farmers if they could have those  
13 -- that alfalfa put right on the train and brought here  
14 to the main line and go on to Los Angeles because they  
15 hire -- right now they hire a truck to take it there and  
16 it's more expensive and takes longer than it would be if

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17 they could just put their product on the train and put  
18 it on the main line of the UP and take it right to the  
19 coast for shipping.

20 In regard to costs, the transportation by  
21 trucks can be more expensive. It doesn't have to be if  
22 the contracts are written right.

23 Being involved in the trucking business, I  
24 understand a little bit about the financial part of it.

25 But the fact of the matter is the truck can haul less

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1 than a railroad car, and the extent of combining rail  
2 and truck, for example, intermodal, will affect the  
3 total cost of this program.

4 The EIS must define how a cost reduction to  
5 the Yucca Mountain program can be achieved with rail and  
6 the projected cost to construct and operate an  
7 intermodal facility in Nevada.

8 We have discussed the inconsistent weighting  
9 of concerns, and by this I mean the Chalk Mountain route  
10 is a potential route for transporting waste. The DEIS  
11 says the Air Force objects to this route and the DOE has  
12 made this a, quote, non-preferred alternative in the  
13 DEIS.

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14           To me this is giving Air Force special  
15 treatment, whether they need it or not. The concerns of  
16 the affected areas of local government, unlike the Air  
17 Force, have status in the Nuclear Waste Policy Act. The  
18 Air Force should not, therefore, qualify for the extra  
19 status.

20           The Chalk Mountain route could minimize the  
21 impact on Nevada rural and urban communities. The DEIS  
22 must explain how the Air Force qualifies for this  
23 special status and how the utilization of the Chalk  
24 Mountain route could reduce overall transportation costs  
25 and risks in southern Nevada. Basically this takes the  
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1 route across the -- what locals here in Lincoln County  
2 call the Bombing Range; it's called the Nellis Range I  
3 believe now -- takes it across the Nellis Range and goes  
4 close to Area 51 that isn't there according to the Air  
5 Force, but that's not the point here.

6           The point here is it could be a much shorter  
7 route. It could be much less expensive to build it that  
8 way and it could be done by guaranteeing the anonymity,  
9 if that's the right word, of what goes on at Area 51 by  
10 proper scheduling.



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11 We feel that there has been an inaccurate  
12 future considerations. DEIS fails to consider the past  
13 and ongoing rapid growth in Nevada and elsewhere. The  
14 DEIS must not underestimate risks to local communities  
15 in Nevada and it should re-evaluate those risks and  
16 incorporate relevant Lincoln, Nye County, Clark County  
17 reports that were largely ignored.

18 Route selection. This topic is inadequately  
19 addressed which essentially renders the DEIS incomplete.  
20 Understanding that Yucca Mountain is the final decision  
21 of the waste shipments, the various routes -- and there  
22 are many of them that culminate at Yucca Mountain --  
23 flow back to several waste generating sites in many  
24 directions.

25 The DEIS appears to assume that truck and

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1 rail shipments to all these routes possess similar risk  
2 characteristics, and this is not accurate. There are  
3 mountain ranges. There are climate changes. There are  
4 population centers. There are rural communities.

5 Each one should be looked at on a case by  
6 case individual basis rather than summarizing something  
7 or putting it into a risk model that has inaccuracies --

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8 or inadequacies maybe is a better word. Accident rates  
9 and population density do not appear as concerns, and  
10 consideration of weather vagaries, construction delays,  
11 necessities for emergency rerouting appears absent.

12 The DEIS must present and analyze the  
13 transportation routes in full view of the reader in  
14 order for a more credible and transparent discussion of  
15 impacts and mitigation.

16 Nevada routes. The transport model selected  
17 by the generating site will determine the route to be  
18 taken to Yucca Mountain. This goes back to my comment  
19 about having the route specified in the contract.

20 The intermodal routes will use different  
21 arteries within Nevada as compared to routes taken by  
22 all truck shipments, and it depends if the originating  
23 site is located east or west of Nevada.

24 The DEIS must present a more thorough  
25 analysis of the transportation routes in Nevada and how  
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1 those routes could potentially change over the  
2 operational life of the repository.

3 Emergency response issues. The DEIS does not  
4 adequately address the emergency response issues. It

5 must provide a more thorough analysis of the emergency  
 6 response issues and specify which locations along the  
 7 designated routes are going to receive the emergency  
 8 response training and support.

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9 The cumulative impacts, once again, in the  
 10 year 2010 it is possible that on the roads in Lincoln  
 11 and especially Nye County there could be nuclear waste  
 12 transportation by truck from three different sources:  
 13 Yucca Mountain, the DOE NTS low disposal, and the DOE  
 14 NTS soil cleanup.

15 The DEIS must analyze for the estimated  
 16 number of trucks that would move on Nevada roads each  
 17 day under this possible scenario. The DEIS must analyze  
 18 for how much emergency response training and other  
 19 mitigation effort would be required to adequately manage  
 20 this much potential nuclear waste transportation in  
 21 southern Nevada.

22 Going back to my comments about specifying  
 23 the route in the contract, when the Department of Energy  
 24 comes to the point of issuing contracts to hauling  
 25 companies, these contracts should be offered only to

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1 those who qualify on the basis of their safety record.

2 My closing comment would be citizens in

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3 Lincoln County have experienced a number of occasions

4 not to be able to trust the Department of Energy. I

5 would admonish you to give us a reason to trust you.

6 That's the end of my comments.

7 Thank you very much. At this time I will

8 recess the taking of formal comments and we can have any

9 informal discussions you wish.

10 (Recess at 6:45 p.m.)

11 (Reconvened at 6:55 p.m.)

12 MR. LUPTON: At this time I will reopen the

13 record for additional comment.

14 MS. SIMKINS: Connie Simkins, Panaca.

15 My additional comment follows along

16 recommending a citizens advisory board for the Yucca

17 Mountain program. The community advisory board for low

18 level waste has asked to be considered to serve in that

19 capacity and a couple of Secretary of Energies ago

20 declined that request.

21 I think it's imperative that the Department

22 of Energy put into their plans a citizens advisory board

23 of some kind so that there can be a link between the

24 communities and information flow both ways from the

25 citizens and from the Department of Energy on what's  
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1 going on, what to expect, how they can get more involved  
2 or get more information.

3 It's largely a public relations thing, but in  
4 order for any credibility to be given to the Yucca  
5 Mountain project they need a way to have the citizens  
6 involved, not to change policy or to impede progress,  
7 but so that the people in the local areas have a way to  
8 get the information that they want and need.

9 MR. LUPTON: Thank you.

10 MS. SIMKINS: That's the end of my comment.